

SYNOPSIS

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The present writ petition is being filed in public interest under Article 32 of the Constitution of India relating to the Respondent No. 4 opening up a pandora box of economic offenses by removing all safeguards against money laundering on bank accounts opened with Aadhaar as the sole "know-your-customer" (KYC) norm and also because the Respondent No. 2 has extended the right to franchise to non-citizens by using the Aadhaar, a card that is issued to residents and not citizens, as the proof-of-identity and proof-of-address for enrolling as a voter.

Further the Respondent No. 3 has built up a registry of citizens based on an unaudited and unverified database of residents built by private parties and including biometrics that are not part of the rules framed under the Citizenship Act. In addition to this the Respondent No. 1 has linked the increased number of rights, entitlements and benefits to the Aadhaar number and making money transfers into unverified bank accounts created from unverified and unaudited database created by the UIDAI and allowing properties to be linked to Aadhaar numbers.

These matters assume significance in the light that the enrollment agencies, sub-registrars, registrars and UIDAI have no legal liability for any theft, fraud, crime, and compromise of

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Aadhaar. The use of Aadhaar by various agencies will expose all IDs, information, properties; entitlements etc. of each registered person to misuse in one go, thus exposing them to unprecedented risk. The registered persons have neither control on who uses your Aadhaar nor any way to know or verify its use by anyone. Further the entire data and biometric is handled by non-Indian companies

This also raises serious concerns about the safety of the money in the banking system linked to Aadhaar numbers. This is particularly as the banks have been directed to open accounts with Aadhaar numbers and it cannot be verified if the number links to real and unique individuals. The money transfers from Aadhaar accounts will not be audited if there is less than Rs10 lakh transferred in a year. This means subsidy, bribes and black money may go to shell accounts that may never be traced or will be impossible to prove. Money can be moved from Aadhaar-to-Aadhaar electronically without the knowledge of any person whose interest may be compromised in the process.

By linking the property transactions and marriages with Aadhaar numbers the government has now exposed all registered persons to transactions in their absence and large-scale organized identity theft, fraud and crime. Even when Aadhaar

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any right, entitlement or benefit that has been delivered through existing identifications. It is not just becoming yet another obstacle in obtaining services from the government but exposing all to denial of these services without Aadhaar or if the Aadhaar database is compromised. If anyone's verification fails, they will lose all benefits across the government till they re-establish their credentials. Re-establishing credentials may be impossible wherever the verification fails due to the theft of the identity.

These sweeping linkages of the Aadhaar are being undertaken even when the Parliamentary Standing Committee on Finance has rejected the Aadhaar exercise. Even the Planning Commission implementing the current scheme has no mandate for such projects. The Executive orders linking the Aadhaar to any right, entitlement or service is bad in law under the constitution as it violates fundamental rights including the inviolable right to life.

The petitioner believes the use of the Aadhaar is based on the following fallacious premises:

1. Each UID number corresponds to a unique real person;
2. Each person can have only one UID;
3. All issued UID numbers are genuine;
4. No identity theft is possible with the UID;

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6. UID database made by the same agencies/documents has no fraud or duplication;
 7. Identity is the barrier to service;
 8. Cash transfer is more effective than the service it was meant to subsidize or deliver;
 9. Cash transfers will reach real beneficiary;
 10. Several trillion Rupees can be transferred directly without any scam;
 11. Financial inclusion is about having a bank account;
 12. 18,950 rural branches can service 593,731 villages or 31 villages to a branch or 40,000 persons per rural branch through UID;
 13. 38,592 branches can service 5,161 cities and towns or 7,500 persons per urban branch through UID;
 14. Corruption in India is because the common man fakes identity;
 15. UID will simplify the processes to access fundamental rights, entitlements and services;

The Petitioner is concerned that Aadhaar facilitates opening of 'mule' accounts. The use of the UID/Aadhaar number enables the creation of bank accounts under identities that may not belong to persons creating the bank accounts; such accounts and the transactions through them cannot be audited or traced; this opens up a Pandora's box for money parking, laundering

entire banking system of India but also the education, marriage, property and life of citizens.

The Petitioner is further concerned that the use of the Aadhaar number by the Respondents denies the fundamental rights of citizens. The use of the UID/Aadhaar number denies the fundamental rights including the inviolable right to life by denying recognition, services, entitlements and benefits to all those whose UID/Aadhaar does not exist, fails or is stolen; The use of the UID/Aadhaar has resulted in violation of the rights promised in the Universal Declaration of Human Rights and in particular Article 3: Right to life, liberty and security of person, Article 6: Right to recognition everywhere, Article 7: Right to equality, Article 8-11: Right to Justice, Article 12: Protection from arbitrary interference with privacy, family, home or correspondence, or to attacks upon honor and reputation, Article 13: Freedom of movement and residence, Article 15: Right to a nationality, Article 17: Right to property, Article 20: No one may be compelled to belong to an association, Article 21: Right of equal access to public services, Article 22: Right to social security, economic, social and cultural rights, Article 26: Right to education, Article 28: Right to social order in which these rights can be realized; The UID, whether passed as bill or not is bad law as per Article 13(2) of the Constitution.

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The petitioner is also concerned that the Aadhaar masquerades what it is not and serves no purpose. The UID/Aadhaar serves no useful purpose when it is based on other identity documents which work in practice; It serves no useful purpose when it is based on "introducers", these are not subject to any audit; These numbers come at huge needless cost to the taxpayer; the continued issuance of the UID and its masquerade as being something that it is not, and continues to cause criminal violations under Sections 197, 198, 199, 200, 218, 167 and 188 of the Indian Penal Code; The number exposes the entire existence of every individual to fraud, theft, abuse and criminal violation; The UID will serve to aid organized crime, financial and physical terrorism, coercion of the public, corruption and large-scale identity theft.

The petitioner is concerned that the Respondents are creating new uses of Aadhaar even as the Standing Committee on Finance has already rejected the UID scheme. The Standing Committee on Finance has already recommended that the UID be scrapped; as such there is no legal approval to the executive orders which are invalid as they exceed the powers of the centre as every state has the powers to pass orders on identity; The Planning Commission that lacks any mandate to undertake such programs, has illegally, arbitrarily and unconstitutionally usurped

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citizens through an unaccountable independent body knows as UIDAI and privatizing fundamental rights and entitlements; The impugned notification of constituting the UIDAI dated 28.01.2009 is illegal, arbitrary and bad in law for violating the fundamental rights, setting out a cascade of laws violating the fundamental rights; On 14.03.2012 in response to Lok Sabha Unstarred Question No 436 the Respondent No 1 Answered "The observations of the Committee are under consideration of the Government." However, the Cabinet has on 8th October 2013 approved a modified bill to be placed before the Parliament in its winter session. The Chairman of the Finance Committee has demanded that the matter be again referred to the Finance Committee for scrutiny.

The petitioner is further concerned that the Respondents are engaging in wasteful expenditure and that the UID scheme is not cost-effective. According to Respondent 1 this exercise has already spent 2,920 crores upto May 2013 and approved 3,023 crores for phase II with a recurring amount projected at 477 crores and 8,692 crores are expected to be spent till 2017. In
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reply to a unstarred question No 2088 in the answered on 29th

August 2013 in Rajya Sabha, Respondent No 1 claimed "against a total cost of Rs.12,398. Crore sanctioned by the Government for the UID Project, an expenditure of Rs.3062 Crore has been

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as well as overreaching executive authority. This is also a ground on which the UK government scrapped the UK ID. Shri Jitendra Singh, Minister of Home Affair in reply to a starred question No 28 in the Rajya Sabha answered on November 23rd 2011 indicated that the scheme for collecting the data required for NPR by house to house enumeration, scanning of the NPR forms, data entry and collection of biometrics has been approved by the Government at an estimated cost of Rs. 6649.05 crores. This is further huge duplication and wastage of public funds to no public good.

The petition gives rise to the questions:

- (A) Whether the Respondent NO. 4 by exercising its powers can do away with identification and verification of bank account holders and prevention of money-laundering practices?
- (B) Whether the Respondent No. 2 by exercise of its powers can do away with ensuring that only citizens get to exercise the franchise?
- (C) Whether the Respondent No. 3 can build a NPR at all under their rules of 25.02.2009, collect biometrics that does not have any legislative sanction and whether the UIDAI database can be used to check the NPR or make the NPR?

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(D) Whether the Respondent No. 1 can make direct bank transfers of any moneys to unverified and unaudited bank accounts or link transactions of properties, marriage and other transactions through processes and numbers that are incapable of being audited, tracked or monitored?

The petitioner is keenly interested in ensuring that the half-baked, purposeless ideas sold in the name of progress without any audit, evaluation, cost-benefit and impact assessment do not destroy the foundation of the Indian economy, put to risk its citizens properties, lives and rights or expediency does not give rise to out-of-control corruption of massive proportions.

The petitioner is keenly interested in restricting the loss to the taxpayer of needless waste. The petitioner is keen that we learn the wisdom and lessons from UK's closing its National ID program and destroying all the data it had gathered even after having spent over 15 billion pounds.

The petitioner has written to the Respondents with these issues to no avail. In order to protect the Union of India and its citizens from such a widespread ruin the Petitioner seeks that the UID not be needed for delivery of rights, entitlements, services,

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prohibition of the use of the UID or UID framework, machinery or data for any transactions that deliver rights, entitlements, services, money or property, freeze on all bank accounts opened with the UID, restraint from any further waste of public funds on the UID, that electoral rolls prepared with the UID as a proof of identity or address to be revised intensively as required under the Registration of Electors Rules 1960 25 (2) to be completed before March 2014, the compilation of the National Population Register in strict compliance of the G.S.R.937(E) ^{Ann-P-1 Pg. 36-51} dated 10th December, 2003 and without any direct or indirect linkage or use of the UID or its machinery, that all money transfers from accounts opened with the UID to be reversed and subsidies, scholarships and other benefits to be administered as before UID or DBT, that of all copies of all resident data collected and stored by the UIDAI and all its partners and contractors be destroyed ^{Ann-P-1 → Pg. 52-56} and that the notification dated 28th January 2009 forming the UIDAI and all acts based on this be declared void. The petitioner also seeks a time-bound judicial probe for appropriate actions, under the supervision of the court, by a retired CAG and Supreme Court Judge supported by the CBI to investigate the irregularities and illegalities committed under the Aadhaar and such criminal or anti-national acts that may have happened in its implementation.

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LIST OF DATES AND EVENTS

Date	Particulars
10-Jan-03	Rules u/s 18 of the Citizenship Act of 1955 notified by G.S.R 937 (E).
28-Jan-09	Planning Commission of India Notifies the UIDAI with mandate to create a UID.
25-Feb-09	Rules u/s 18 of the Citizenship Act of 1955 notified by G.S.R 124 (E).
12-May-10	News report in Computer weekly UK government to scrap 15 billion pounds of projects involving the UK ID.
12-May-10	News report from BBC indicating that Identity cards to be scrapped.
27-May-10	News report in the Guardian on UK government's intent to scrap the ID cards within 100 days.
18-Aug-10	Reply to unstarred question 4123 in the Lok Sabha on allocation of funds for the UID.
1-Sep-10	RBI statistics on: Bank-Group and Population Group-Wise Number of Branches of Scheduled Commercial Banks.
3-Dec-10	National Identification Authority of India Bill, 2010 introduced in the Rajya Sabha.
13-Dec-11	The Standing Committee on Finance and urged the government to reconsider and review the UID

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scheme and also the proposals contained in the Bill in all its ramifications.

- 21-Jan-11 News report from the UK government declaring the ID cards will no longer be valid from the midnight.
- 27-Jan-11 RBI Notification RBI/2010-11/389 DBOD.AML.No. 77 /14.01.001/2010-11 making anti-money laundering rules applicable for bank accounts opened with Aadhaar.
- 1-Jul-11 RBI Notification RBI/2011-12 /74 DBS. FrMC. BC. No. 1/23.04.001/2011-12 on fraud classification and reporting.
- 28-Sep-11 RBI Notification 12/207DBOD.AML RBI/2011. BC. No. 36/14.01.001/2011-12 relaxing anti-money laundering rules for bank accounts opened with Aadhaar.
- 14-Dec-11 Reply to unstarred questions No 3304 in the Lok Sabha on unverified data collection by the UIDAI.
- 26-Dec-11 RBI Notification RBI/2011-12/314 DNBS (PD).CC. No 251 /03.10.42 /2011-12 that shifts responsibility of customer verification.
- 14-Mar-12 Reply to unstarred question 292 in the Lok Sabha on the rejection of the UIDAI bill by the Standing Committee on Finance.

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2-May-12 Reply to unstarred question 3950 in the Rajya Sabha on Fake Aadhaar cards.

9-May-12 Replies to unstarred question No 5505 in the Lok Sabha on UID fraud.

17-May-12 RBI Notification RBI/2011-12/566 DBOD. No. BL. BC: 105/22.01.009/2011-12 on financial inclusion and banking correspondents.

2-Jul-12 RBI Notification RBI/ 2012-13/55UBD. BPD. (PCB). MC. No. 16/12.05.001/2012-13 specifying obligations of the banks under the prevention of money laundering act of 2002.

15-Nov-12 Letter from ADG, UIDAI to Secretary, ECI about use of Aadhaar for enrolling voters.

24-Nov-12 News report in the DNA on Aadhaar based cash transfers in Maharashtra.

17-dec-12 Reply to starred question No 333 in the Rajya Sabha on schemes proposed to be linked with Aadhaar card for providing benefits of schemes to people.

23-Jan-13 News report in the Indian Express on requirement of Aadhaar to register marriage.

24-Jan-13 News report from Mid-Day on how Aadhaar is being misused by banks.

27.2.2013 Response to starred question No 57 on EPFO

mandating Aadhaar.

- 2-Mar-13 News report in the DNA on Maharashtra recording most cash transfers.
- 12-Mar-13 RBI Circular RBI / 2012-13 / 436 A.P. (DIR Series) Circular No. 89 on revised guidelines for money transfer schemes.
- 20-Mar-13 Reply to unstarred question 3842 in the Lok Sabha on cash transfer scheme.
- 26-Mar-13 UK government's information guide on the cancellation of ID cards.
- 6-Apr-13 Letter written by Petitioner to the Chief Minister of Maharashtra.
- 10-Apr-13 Letter written by Petitioner to the Home Minister.
- 10-Apr-13 Letter written by Petitioner to the Finance Minister.
- 23-Apr-13 News report in the Times of India on loss of 3 lakh UID cards.
- 6-Jun-13 Letter written by Petitioner to the Cabinet Secretary.
- 1-Jul-13 RBI Master Circular RBI/2013-14/1 Master Circular No.1 /2013-14 on money transfer service scheme.
- 1-Jul-13 RBI Notification RBI/ 2013-14/31 UBD.BPD. (PCB).MC.No.16 /12.05.001/2013-14 specifying obligations of the banks under the prevention of

money laundering act of 2002. P

- 28-Jul-13 News report from Down to Earth on the impact of cash transfers on people's lives in Rajasthan.
- 13-Aug-13 News report In Mailonline on 13 lakh bogus voters and suspected Bangladeshis uncovered by the ECI.
- 23-Aug-13 Email trail of instructions by Deputy Commissioner of Police, Cyber Crime, Pune Police Dept. in response to a complaint to him and the DG UIDAI and Chairman HDFC.
- 29-Aug-13 Reply to unstarred question 2088 in the Rajya Sabha on amount spent on the Aadhaar card.
- 3-Oct-13 News report in the DNA on Aadhaar linked property verification to be implemented soon.
- 15-Oct-13 News report in Moneylife giving proof that Aadhaar de duplication does not work.

19/10/2013. Hence this Petition

IN THE SUPREME COURT OF INDIA
CIVIL ORIGINAL JURISDICTION
WRIT PETITION (CIVIL) NO. OF 2013
(Under Article 32 of the Constitution of India)

In the matter of:

Nagrik Chetna Manch

Non-Government Organization,

Through its President,

Maj. Gen. S.C.N. Jatar,

Residing at:

A-102 Neel Sadan

1426 Sadashiv Peth

Pune 411030

Petitioner

Versus

1. Union of India,

Through Cabinet Secretary

Government of India,

Rashtrapati Bhawan Complex

New Delhi 110004

Respondent No.1

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2. The Chief Election Commissioner,
Election Commission of India,
Nirvachan Sadan, Ashoka Road,
New Delhi 110001

Respondent No.2

3. Registrar General of India
Ministry of Home Affairs
2/A, Man Singh Road,
New Delhi-110011

Respondent No.3

4. Reserve Bank of India
Through Governor
Central Office Building 18th Floor,
Shahid Bhagat Singh Road
Mumbai 400001

Respondent No. 4

TO

THE HON'BLE CHIEF JUSTICE OF INDIA
AND HIS COMPANION JUSTICES
OF THE SUPREME COURT OF INDIA

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THE HUMBLE PETITION OF THE
PETITIONER ABOVENAMED

MOST RESPECTFULLY SHOWETH:

- 1) The present writ petition is being filed in the public interest under Article 32 of the Constitution of India by the Petitioner seeking intervention of the Hon'ble Court through a writ of mandamus or any other writ and/ or direction to all the four Respondents that having incorporated the Aadhaar, a 12 digit individual identification number issued by the Unique Identification Authority of India on behalf of the Government of India into their functioning and procedure they do not destroy the foundation of the country, its economy and the life of its citizens. As the Respondents have extended the right to franchise to non-citizens by using the Aadhaar, a card that is issued to residents and not citizens, as the proof-of-identity and proof-of-address for enrolling as a voter.

1A) The petitioner has not approached the concerned authorities for the same reliefs.

2) The Petitioner Nagrik Chetna Manch is a registered Non Government Organisation (Registration No F-7352,,), under the Mumbai Public Trust Act, 1950 dated 24 February 1992 at Pune, Maharashtra. Registration certificate and authority letter in the name of Maj. Gen. S.C.N.Jatar is enclosed with the vakalatnama. It is open to all citizens and is not affiliated to any political party. It came into existence on August 15, 1991. The petitioner largely comprises of senior company executives, professionals, social workers, retired defense officers and civil servants, etc who do not have any political affiliation. The petitioner seeks issue-based support from the media and the public and networks with other like-minded NGOs to lend force to issues that the petitioner takes up. Its mission is to function as an active pressure group and conscience-keeper to control wasteful expenditure in society, to strive to inculcate thrift and conscientious behaviour amongst citizens to avoid affluent expenditure at various levels, to act as a pressure group to safeguard national interest, to seek co-operation in its endeavour from like-minded people and organisations, and; to act as catalysts by collaborating with other NGOs for implementation of its Mission

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- 3) There is another case presently with the Supreme Court addressing the exercise of executive power under Article 73 of the Constitution of India by formulating a scheme which adversely affects fundamental rights of the citizen.
 - 4) The petitioner is keenly interested in ensuring that the half-baked, purposeless ideas sold in the name of progress without any audit, evaluation, cost-benefit and impact assessment do not destroy the foundation of the Indian economy, put to risk its citizens properties, lives and rights or expediency and does not give rise to out-of-control corruption of massive proportions.
 - 5) The petitioner is keenly interested in restricting the loss to the taxpayer of needless waste. The petitioner is keen that we learn the wisdom and lessons from UK's closing its National ID program and destroying all the data it had gathered even after having spent over 15 billion pounds.
 - 6) On 28.01.2009 Planning Commission of India notified the Unique Identification Authority of India (UIDAI) with mandate to create a unique identification (UID) to the residents of India. Almost simultaneously on 25.02.2009 the

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Citizenship Act, 1955 when such Rules already existed since 10.12.2003 and defined the creation of the National Population Registry (NPR). The modified Rules do not have the National Population Registry. While these Rules have legislative sanction the UIDAI is running on an executive fiat. A copy of the said Rules as notified since 10.12.2003, ^{→ Pg- 52-56} the notification dated 28.1.2009, and the rules notified ^{→ Pg- 57-82} again on 25.02.2009 is annexed herewith as **Annexure P-1(Colly)** (Page No 36-82)

- 7) Just soon after Planning Commission of India notified the UIDAI program the United Kingdom government announced that it would scrap its 15 Billion pounds worth of project involving the United Kingdom ID program. The United Kingdom Parliament passed Identity Documents Act 2010. Section 1(1) of the Act repealed the Identity Cards Act 2006 on 21 January 2011 (making all ID cards invalid) and mandated the destruction of all data on the National Identity Register by 21 February 2011. The various news ^{→ Pg- 83-84} reports dated ^{→ Pg- 85-88} 12.5.2010, ^{→ Pg- 89-93} 12.5.2010 and 27.5.2010 indicating the U.K. government intent to scrap the program are annexed hereto as **Annexure P-2 (Colly)** (Page No. 83-93)
- 8) This move is estimated to have saved over 800 million pounds of annual maintenance costs alone. The ID register was officially destroyed on 10 February 2011 when the final

500 hard drives containing the register were shredded at RDC in Witham, Essex. This drastic step of destroying the data and ending the scraping program was considered necessary for the following reasons-

- a) Tampering and forgery is possible with such a ID,
- b) That failure of technology at any stage would deny the identity,
- c) The costs of such identity programs is very high'
- d) Universal registers of personal information are very rarely effective as solutions to eradicate corruption and incompetence of the government.

9) The Prime Minister of UK, David Cameroon highlighted that due to such identity schemes "Instead of the state being the servant to the citizen, it suddenly becomes the master. Any breakdown in this register will mean that a whole series of services will collapse and your access to those services will collapse. If it was compulsory to carry your card everywhere you went that you had to produce it upon request from a police officer who didn't have to have any excuse to ask you. It's a horrible vision but one could understand the ID cards having a real potency and a power." These objections which were the basis of scrapping the UK's identity program remain completely applicable and valid for the UID of India.

10) The U.K. Prime Minister also pointed out that ID ⁸ programs increase risk of identity theft for organized crime. Contrary to the claims of identity program proponents, people who are nomads, homeless and poor risk being criminalized or excluded by failing to update their registration periodically. This also raises concerns about how the authorities may abuse their powers to cause abuse and discrimination. Undoubtedly the UID is a high risk to sleepwalk into a surveillance society and identity theft with organized crime, an Orwellian 1984 dystopia.

11) In the Lok Sabha on 18.8.2010 in a response to the unstarred Question No 4123 on allocation of funds for the UID the government stated that it has approved an estimated cost of Rs.3023.01 crore for UID phase II. Of this, an amount of Rs.477.11 crore would be towards recurring establishment expenditure and Rs.2545.90 crore would be towards non-recurring project related expenditure. The said response dated 18.8.2010 is annexed herewith as

Annexure P-3 (Page No. 94-95)

12) According to Respondent 4 India has less than 32,000 rural banks and almost 600,000 villages. An identity number cannot fill this gap even by creating a bank account for every number. It is absurd that the government is equating bank accounts as financial inclusion. RRI statistics dated

1.09.2010 on Bank-Group and Population Group-Wise
Number of Branches of Scheduled Commercial Banks is
annexed hereto as **Annexure P-4.** (Page No. 96)

13) The National Identification Authority of India Bill, 2010 was introduced in the Rajya Sabha on 3.12.2010. The Standing Committee on Finance chaired by Shri Yashwant Sinha examined the said bill and urged the government to review and reconsider the scheme and the proposals within the Bill in all its ramifications.

14) On 21.1.2011 the United Kingdom government declared that its ID cards will no longer be valid from midnight. This meant that it had officially terminated its ID project from this date. The news report dated 21.1.2011 of the U.K. government declaring that the ID cards will no longer be valid from midnight is annexed hereto as **Annexure P-5.** (Page No. 97-98)

15) In the meanwhile in India the Respondent No. 4 opened up the use of Aadhaar as the sole Know Your Customer (KYC) document in order to open 'small bank accounts'. These accounts would be subject to the same Anti Money Laundering Rules as other 'small bank accounts'. The RBI notification RBI/2010-11/389 DBOD.AML.No. 77 /14.01.001/2010-11 dated 27.1.2011 making anti-money laundering rules applicable for bank accounts opened with

annexed hereto as **Annexure P-6** (Page No. 99-106)

16) Recognizing the importance of fraud detection the Respondent No. 4 notified on 01.07.2011 a classification scheme for fraud detection and notification. The said notification RBI/2011-12 /74 DBS. FrMC. BC. No. 1/23.04.001/2011-12 dated 1.07.2011 is annexed hereto as

Annexure P-7 (Page No. 107-141)

17) On 28.09.2011 the Respondent NO. 4 issued a notification that relaxed Anti Money Laundering Rules for bank accounts opened with Aadhaar as their KYC. The said notification RBI/2011-12/207 DBOD.AML.BC.No. 36/ 14.01.001/2011-12 dated 28.09.2011 is annexed hereto as **Annexure P-8** (Page No. 142-148)

18) In the Lok Sabha on 14.12.2011 in reply to unsatrrred question no 3304 on unverified data collection by the UIDAI the government stated that "Aadhaar project is a developmental initiative and not a security related Initiative. UIDAI has a mandate to generate and issue an unique identification number to every resident who enrolls. It does not confer citizenship nor does it guarantee entitlements, which will be determined by the relevant statutory/implementing authorities. Hence, compromise of internal security due to UIDAI enrolments does not arise.

UIDAI is issuing Unique Identification numbers (called Aadhaar Numbers) to all residents and is enrolling through

its various Registrars including Registrar General of India

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(RGI) who is one of the Registrars of UIDAI. RGI is creating a National Population Register (NPR) of persons usually residing in India under the Citizenship (Registration of citizens and issue of National Identity cards) Rules, 2003 read with Citizenship Act, 1955. If RGI does not accept the biometric enrolment data of other Registrars of the UIDAI eco-system, there could be duplication in creation of biometrics by the RGI. In order to resolve the difference of opinion on the issue of duplication, the matter is being taken to the Cabinet Committee on UIDAI for a final view".

The Lok Sabha Unstarred Question No 3304 Answered on

14.12.2011 is annexed hereto as **Annexure P-9** *(Page No 149
Tb 152)*

19) From the aforesaid response of the government raise serious questions about Aadhaar allowing backdoor control and access to NPR data. Since the statement by the government the Respondent No 3 has signed up to be a registrar of the UIDAI when in fact they are the agency that under law cannot make available any individual records collected by them. This also violates Section 15 of the Census Act of 1948.

20) Through tie up with the UIDAI the Respondent No. 3 has opened up a backdoor access to enrolling non-citizens and unverified and unaudited 'individuals' into the data collected

by the Respondent No. 3. This also means that the NPR will no longer be a registry of citizens as mandated by law.

21) The collection of biometrics is not within the ambit of the Citizenship Act 1955 and / or amendment under Citizenship Rules 2003. The use of the UID data for the NPR is therefore illegal. This Citizenship Act by its very title is for Citizens of India and by using the UID resident database to build a citizen register is recognizing 'residents' on par with citizens. The Respondent No. 3 has thus opened the scope for capturing the biometrics of citizens and as such this is not permitted by the rules framed under the Citizenship Act.

22) In a dramatic shedding of responsibility on 26.12.2011 the Respondent No. 4 shifted the responsibility of customer verification to banks and yet did not scrap the use of Aadhaar as the sole KYC. The RBI Notification RBI Notification RBI/2011-12/314 DNBS (PD).CC. No 251 /03.10.42 /2011-12 dated 26.12.2011 that shifts responsibility of customer verification is annexed hereto as

Annexure P-10 (Page No. 153-159)

23) On 14.03.2012 in reply to unstarred question no 292 in the Lok Sabha on the rejection of the UIDAI Bill by the Standing Committee on Finance the government stated that "The observations of the Committee are under consideration of the Government". The Lok Sabha

292 Answered on 14.03.2012 is annexed hereto as

Annexure P-11 (Page No. 160-162)

24) On 2.05.2013 in response to unstarred question 3950 in the Rajya Sabha on Fake Aadhaar cards the government stated that A scrutiny of all biometric exception enrollments was done and this led to the cancellation of 3.84 lakh Aadhaar numbers. This does not include fake Aadhaar numbers because there was no biometric exception and therefore the number could be many fold larger. The Rajya Sabha untarred Question No 3950 Answered on 2.05.2013 is annexed hereto as **Annexure P-12.** (Page No. 163-164)

25) On 9.05.2012 in reply to unstarred question No 5505 in the Lok Sabha on UID fraud the government admitted that Some cases of process non compliance and fraudulent enrolment have been reported against some enrolment agencies in some places. It also admitted to enrolments with fictitious name 'Kothimeer' by operators/supervisors. The Lok Sabha unstarred Question No 5505 Answered on 9.05.2012 is annexed hereto as **Annexure P-13.** (Page No. 165-167)

26) That on 17.5.2012 the Respondent NO. 4 notified a scheme on financial inclusion and banking correspondents. These further deals in the ability to impose audit, and protect bank accounts specially when linked to Aadhaar numbers. The

09/2011-12 dated 17.5.2012 is annexed hereto as **Annexure P-14** (Page No. 168-171)

27) On 2.7.2012 the Respondent NO. 4 specified obligations of banks under the prevention of Money Laundering Act, 2002.

The notification dated 2.7.2012 with notification number RBI/2012-13/55UBD.BPD.(PCB).MC.No.16/12.05.001/2012-13 is annexed hereto as **Annexure P-15** (Page No. 172-264)

28) On 15.11.2012 the Assistant Director General, UIDAI wrote to the Secretary, Respondent No. 2 about use of Aadhaar for enrolling voters. This letter dated 15.11.12 is annexed hereto as **Annexure P-16** (Page No. 265-268)

29) On 24.11.2012 a news report in DNA stated that the Maharashtra Chief Minister planned to start Aadhaar based cash transfers from January. The said news item dated 24.11.12 is annexed hereto as **Annexure P-17** (Page No. 269-270)

30) In reply to starred question no 333 on schemes proposed to be linked with Aadhaar cards in the Rajya Sabha the government stated that it decided to shift to a system of Aadhaar enabled direct cash transfer of benefits under 34 identified Central Sector/Centrally Sponsored Schemes. The Lok Sabha Starred Question No 333 Answered on 17.12.2012 is annexed hereto as **Annexure P-18** (Page No. 271-272)

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31) On 23.1.2013 a news report in the Indian Express reported that Aadhaar numbers will be compulsory to register marriages. This linking of the Aadhaar with any government records can create fraudulent transactions even in the absence of the person. In the case of marriage people can be fraudulently married by merely having access to their Aadhaar numbers. The said news report dated 23.1.13 is annexed hereto as **Annexure P-19** (Page No 273-274)

32) Bank accounts can now be opened without the Aadhaar holder's knowledge. Now it is not just easy to open bank accounts without verifying if individuals actually exist or request a bank account but in actual practice banks are opening accounts based on Aadhaar without the presence or permission of the Aadhaar holder. For example a couple based in Colaba, who were alarmed when a letter arrived at their doorstep last week from the Indian Overseas Bank (IOB). It was addressed to their 10-year-old daughter, and claimed that a Savings Bank (SB) account had been opened under her name even when neither bank with IOB nor had they applied for linking the Aadhaar to any bank account. The news report from Mid Day dated 24.1.2013 on how Aadhaar was misused by banks to open these accounts is annexed hereto as **Annexure P-20**. (Page No 275-280)

33) On 27.2.2013 in response to starred question 57 in the Rajya Sabha the government stated that "The Employees' Provident Fund Organisation (EPFO), vide their letter dated 21st January, 2013, made it mandatory to submit Aadhaar number details for the New EPF members joining on or after March 1, 2013. Subsequently, during discussions with Unique Identification Authority of India, it emerged that UID is not enrolled in all the states. Therefore, it was decided not to make Aadhaar number mandatory for new members joining on or after March 1, 2013 and these revised instructions were issued by EPFO vide their letter dated 6th February, 2013."

Needless to say it has created enough angst and confusion for the beneficiaries. The response dated 27.2.2013 of the starred question 57 is annexed hereto as **Annexure P-21** (Page No. 281-283)

34) On 2.3.2013 in news report of DNA indicated that Maharashtra leads the country in cash transfers. According to the report Maharashtra information technology department officials, the state of Maharashtra has accounted for 38,718 or around 47% of the total 82,799 transactions under the Aadhaar payments bridge (APB) in February. Maharashtra has 3.19 lakh beneficiaries under the 34 Central schemes that have been covered under the programme. According to the report an

This seems like an absurdly laborious exercise to transfer a small amount of Rs. 15 to each beneficiary. This said report of Mid Day dated 2.3.2013 is annexed hereto as **Annexure P-22.**

(Page No. 284 - 285)

35) As the number of transactions of DBT increases so does the probability of frauds. The Respondent No 1 is thus undertaking Direct Bank Transfers (DBT) of subsidy and other moneys in lieu of actual benefits without verification or auditing the "small bank accounts" which have been opened impersonally solely on the "KYC" of the UID, under guidelines revised by the Respondent No 4, or without the physical presence of the "beneficiaries" in bank branches. It, therefore, cannot certify that these accounts do not belong to or are operated by anyone other than the person whose UID it is. This means that the DBT can be made to non-existent persons or to multiple accounts of the same person or to persons impersonating others.

36) The Respondent NO. 4 on 12.3.13 revised its guidelines on Money Transfer Schemes. The RBI circular no RBI/2012-13/436A.P.

37) In reply to unstarred question 3842 in the Lok Sabha on cash transfer scheme the government stated that " the concerned Ministries collect, verify and upload the data on implementation

to monitor the implementation regularly. Also, the National Committee on Direct Cash Transfers and Executive Committee on Direct Cash Transfers are entrusted with the responsibility to review of the progress of its implementation from time to time for mid-course correction. Similarly, UIDAI closely monitors and reviews the progress of enrolment and dispatch of Aadhaar numbers to those enrolled on a regular basis."

This means that there are no mechanisms by Respondents 1 and 4, in place to prevent benefits, transactions, money laundering, embezzlement, bribe money deposits, and other crime to happen or even be detected with money transfers to or from these UID linked bank accounts. Even the liability of such crimes may therefore be unfairly attributed to the persons whose identities are linked to the UIDs rather than those who have stolen the identity. This is in complete violation of social and economic justice the inviolable right to life as well as financial prudence and auditability. The response to unstarred question 3842 dated 20.3.2013 is annexed hereto as **Annexure P-23** (Page No. 286-289)

38) The United Kingdom government on 26.3.2013 released an information guide for citizens on the cancellation of its ID cards.

This indicates the concern shown by the U.K. government to its citizens in not only scrapping the malicious program but also providing them with guidelines on alternative ways to provide identity. The said notification of the information guide dated

39) Between 6.4.2013 to 10.4.2013 a member of the petitioner organization wrote letters to the Chief Minister of Maharashtra, The Home Minister of India and the Finance Minister of India in order to point out the deficiencies brought about by the aforesaid events and with a plea to correct them at the earliest.

The three letters dated ^{Pg-295-297} 6.4.2013, ²⁹⁸⁻³⁰³ 6.4.2013 and ³⁰⁴⁻³⁰⁸ 10.4.2013 are annexed hereto as **Annexure P-25 (Colly)**. (Page No. 295-308)

40) The Times of India reported on 23.4.2013 the loss of over 3 lakhs UID cards from the Government of Maharashtra. The Government to date has given no indication of how those whose Aadhaar cards have been lost were informed and provided with a solution to the lost identity. The government has also been silent on protection of these individuals from misuse of identity if found by unauthorized persons. The news 23.4.2013 from Times of India is annexed hereto as **Ann P-26**. (Page No. 309-313)

Citizenship

41) Deeply concerned about the adverse impacts of Aadhaar and the linkage of Aadhaar to various government databases was having on the citizens, lives and the integrity of the country the petitioner wrote to the Cabinet Secretary on 6.6.2013. There is no reply from the Cabinet Secretariat till today. The letter written

by the petitioner to the Cabinet Secretary on 6.6.2013 is annexed hereto as **Annexure P-27.** (Page No. 314-322)

42) The Respondent NO. 4 issued a Master Circular on Money Transfer Service Scheme on 1.7.2013 and simultaneously issued a notification specifying the obligations of the banks under the Prevention of Money Laundering Act, 2002.

43) Down to Earth published a news report on the impact of cash transfers on the lives of people in Rajasthan on 28.7.2013. This report indicates people are worse off due to cash transfers than before. This news dated 28.7.13 from Down to Earth is annexed hereto as **Annexure P-28.** (Page No. 323-333)

44) The Mail Online published a story on ¹³~~30~~.08.2013 indicating that the Respondent No. 2 has uncovered 13 lakh bogus voters suspected to be Bangladeshi's who enrolled using the Aadhaar card. The news item dated ¹³~~30~~.8.2013 is annexed hereto as **Annexure P-29.** (Page No. 334-337)

45) On 8th August the Petitioner got an email from HDFC to attend an Aadhaar enrolment camp. On enquiries and from the list on the UIDAI website it was discovered that the HDFC Bank was neither a registrar nor an enrolment agency of the UIDAI. A complaint was filed with cybercell of the Pune Police, the UIDAI

had approached Dena Bank with a request to hold camps in our branches, and they had provided us with a list of their enrolment agencies which can conduct camps for us. C-Saastra is one such enrolment agency under them in readiness to conduct camps in Pune district. C-Saastra submits an enrolment plan (branches to be covered for Aadhaar enrolment) to Dena Bank officials which is then available in Public Domain. The addresses for the branches in Aundh and Swargate are available on the portal. We are therefore permitted to let customers and non-customers enrol at these branches." It is thus evident that the Aadhaar has unleashed a free-for-all irresponsible and highly dangerous set of procedures to open, maintain and operate bank accounts. Therefore it is obvious that the Aadhaar data and the linked bank accounts are not either authentic or secure. The Email trail dated 23.8.2013 of instructions by Deputy Commissioner of police Cyber Crime Pune Police Department, in response to complaint made to him and the DG UIDAI and Chairman HDFC is annexed hereto as **Annexure P-30.** (Page No 338-345)

- 46) The aforesaid illustrates the failure of the Respondent No 1 and Respondent No 4 to ensure any process that guarantees only real or genuine individuals will be registered, only real individuals will have Aadhaar linked bank accounts, only authorized bank accounts may be opened, or the data of any real persons is protected. This demonstrates the complete inability to prove

47) Wasteful Expenditure and the UID scheme are not cost-effective.

In reply to a unstarred question No 2088 in the answered on 29th August 2013 in Rajya Sabha, Respondent No 1 claimed "against a total cost of Rs.12,398 Crore sanctioned by the Government for the UID Project, an expenditure of Rs.3062 Crore has been incurred as on 31st July 2013". This is wastage of public funds as well as overreaching executive authority. This is also a ground on which the UK government scrapped the UK ID. The reply to unstarred question 2088 dated 29.8.2013 is annexed hereto as **Annexure P-31.** (Page No. 346-347)

48) On 3.10.2013 the Inspector General of Registration Maharashtra State was quoted in the DNA saying that Aadhaar will be mandatory for property verification. This will make it extremely easy for the government or hackers to move cause property theft by merely changing the Aadhaar number associated with the property. Even now the Maharashtra Government has linked e- mahaseva portal with Aadhaar portal for verification and authentication, the operator has access to Aadhaar information, when he enters Aadhaar no in the field on the mahaseva information page from where in he is able to copy paste the photo of persons who may not be present at transactions. The DNA report dated 3.10.2013 is annexed hereto as **Annexure P-**

32. (Page No. 348-349)

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- 49) To make matters worse, in 2011, in its e-governance policy, the Government of Maharashtra had declared that it would make an endeavor to work out a time bound approach to incorporate and encourage the use of Aadhaar for various e-Governance projects to facilitate the delivery of services to the right beneficiary. All projects cleared by PIC/HPC will clearly define the integration of UID (if relevant) in the project. Aadhaar increases the risk of suffering by linking e-governance projects.
- 50) The moneylife published a news report on 15.10.2013 indicating the curious case of Mr. Narayanan from Kerala who has been issued two Aadhaar cards with different numbers and different photographs of the same person. This completely debunks the claim of the government that no individual can enroll more than once and the Aadhaar database lacks duplicates. The news item from money life dated 15.10.2013 is annexed hereto as **Annexure P-33.** (Page No. 350 - 352)

GROUNDS

Hence the petitioner moves before this Hon'ble Court by way of this petition on, inter alia, following grounds:

- a) BECAUSE Aadhaar facilitates opening of 'mule' accounts.

The use of the UID/Aadhaar number enables the creation

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persons creating the bank accounts; such accounts and the transactions through them cannot be audited or traced; this opens up a Pandora's box for money parking, laundering and embezzlement with the potential to destroy not just the entire banking system of India but also the education, marriage, property and life of citizens;

b) BECAUSE the use of the UID/Aadhaar number denies the fundamental rights including the inviolable right to life by denying recognition, services, entitlements and benefits to all those whose UID/Aadhaar does not exist, falls or is stolen; The use of the UID/Aadhaar has resulted in violation of the rights promised in the Universal Declaration of Human Rights and in particular Article 3: Right to life, liberty and security of person, Article 6: Right to recognition everywhere, Article 7: Right to equality, Article 8-11: Right to Justice, Article 12: Protection from arbitrary interference with privacy, family, home or correspondence, or to attacks upon honor and reputation, Article 13: Freedom of movement and residence, Article 15: Right to a nationality, Article 17: Right to property, Article 20: No one may be compelled to belong to an association, Article 21: Right of equal access to public services, Article 22: Right to

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social security, economic, social and cultural rights, Article 26: Right to education, Article 28: Right to social order in which these rights can be realized; The UID whether passed as bill or not is bad law as per Article 13(2) of the Constitution;

c) BECAUSE Aadhaar masquerades what it is not and serves no purpose. The UID/Aadhaar serves no useful purpose when it is based on other identity documents which work in practice; It serves no useful purpose when it is based on "introducers", these are not subject to any audit; These numbers come at huge needless cost to the taxpayer; the continued issuance of the UID and its masquerade as being something that it is not, and continues to cause criminal violations under Sections 197, 198, 199, 200, 218, 167 and 188 of the Indian Penal Code; The number exposes the entire existence of every individual to fraud, theft, abuse and criminal violation; The UID will serve to aid organized crime, financial and physical terrorism, coercion of the public, corruption and large-scale identity theft;

d) BECAUSE the Standing Committee on Finance already rejected the UID scheme. The Standing Committee on Finance has already recommended that the UID be scrapped; as such there is no legal approval to the

executive orders which are invalid as they exceed the powers of the centre as every state has the powers to pass orders on identity; The Planning Commission that lacks any mandate to undertake such programs, has illegally, arbitrarily and unconstitutionally usurped wide, unrestricted powers violating the fundamental rights of the citizens through an unaccountable independent body known as UIDAI and privatizing fundamental rights and entitlements; The impugned notification of constituting the UIDAI dated 4th November 2008 is illegal, arbitrary and bad in law for violating the fundamental rights, setting out a cascade of laws violating the fundamental rights; On 14.03.2012 in response to Lok Sabha Unstarred Question 292 → Annexure P-11 → Pg 160-162 No 428 the Respondent No 1 Answered "The observations of the Committee are under consideration of the Government." However, the Cabinet has on 8th October 2013 approved a modified bill to be placed before the Parliament in its winter session. The Chairman of the Finance Committee has demanded that the matter be again referred to the Finance Committee for scrutiny.

- e) BECAUSE the Wasteful Expenditure and the UID scheme is not cost-effective. According to Respondent 1 this exercise has already spent 2,920 crores upto May 2013 and approved 3,023 crores for phase II with a recurring

expected to be spent till 2017. In reply to a unstarred
Annexure - 31 Pg 346-347
question No 2088 in the answered on 29th August 2013 in
Rajya Sabha, Respondent No 1 claimed "against a total
cost of Rs.12,398 Crore sanctioned by the Government for
the UID Project, an expenditure of Rs.3062 Crore has been
incurred as on 31st July 2013". This is wastage of public
funds as well as overreaching executive authority. This is
also a ground on which the UK government scrapped the
UK ID. Shri Jitendra Singh, Minister of Home Affairs in
reply to a starred question No 28 in the Rajya Sabha
answered on November 23rd 2011 indicated that the
scheme for collecting the data required for NPR by house
to house enumeration, scanning of the NPR forms, data
entry and collection of biometrics has been approved by
the Government at an estimated cost of Rs. 6649.05
crores. This is further huge duplication and wastage of
public funds to no public good.

- f) BECAUSE by linking the property transactions and
marriages with Aadhaar numbers the government has now
exposed all registered persons to transactions that can be
conducted in their absence and large-scale organized
identity theft, fraud and crime. Even when Aadhaar does
not guarantee anything or add any value to the delivery of
any right, entitlement or benefit that has been delivered

another obstacle in obtaining services from the government but exposing all to denial of these services without Aadhaar or if the Aadhaar database is compromised. If anyone's verification fails, they will lose all benefits across the government till they re-establish their credentials. Re-establishing credentials may be impossible wherever the verification fails due to the theft of the identity.

- g) BECAUSE the Respondent NO.4 by exercise of any powers cannot be allowed to do-away away with identification and verification of bank account holders and prevention of money-laundering practices.
- h) BECAUSE the Respondent NO. 2 by exercise of its powers cannot be allowed to do away with ensuring that only citizens get to exercise the franchise.
- i) BECAUSE the Respondent No.3 may not be allowed to construct NPR or collect biometrics without legislative sanction and the UIDAI's database of residents cannot also be used to check NPR's database of citizens.
- j) BECAUSE the Respondent No. 1 cannot be allowed to make direct bank transfers of any moneys to unverified and unaudited bank accounts or link transactions of properties, marriage and other transactions through processes and numbers that are incapable of being

- k) BECAUSE Respondent No. 4 has opened up a pandora box of economic offenses by removing all safeguards against money laundering on bank accounts opened with Aadhaar as the sole "know-your-customer" (KYC) norm.
- l) BECAUSE the Respondent No. 2 has extended the right to franchise to non-citizens by using the Aadhaar, a card that is issued to residents and not citizens, as the proof-of-identity and proof-of-address for enrolling as a voter.
- m) BECAUSE Respondent No. 3 is building a registry of citizens based on an unaudited and unverified database of residents built by private parties and including biometrics that are not part of the rules framed under the Citizenship Act.
- n) BECAUSE Respondent No. 1 is linking more and more number of rights, entitlements, and benefits to the Aadhaar number and making money transfers into unverified bank accounts created from unverified and unaudited database created by the UIDAI and are allowing properties to be linked to Aadhaar numbers.
- o) BECAUSE these matters assume significance in the light that the enrollment agencies, sub-registrars, registrars and UIDAI, who have full possession of all data and numbers of enrolled residents, have no legal liability for any theft,

that may be perpetuated through Aadhaar. The use of Aadhaar by various agencies is now exposing all IDs, information, properties; entitlements etc., of each registered person to misuse in one go thus exposing them to unprecedented risk. The registered persons have neither control on who uses their Aadhaar number nor any way to know or verify its use by anyone. Further the entire data and biometric is handled by non-Indian companies.

p) BECAUSE this also raises serious concerns about the safety of the money in the banking system linked to Aadhaar numbers. This is particularly so as the banks have been directed to open accounts with Aadhaar numbers instantaneously—they can no longer verify if the number links to real and unique individuals. The money transfers from Aadhaar accounts are not audited if there is less than Rs10 lakh transferred in a year. This means subsidy, bribes and black money may go to shell accounts that may never be traced or will be impossible to prove. Money can be moved from Aadhaar-to-Aadhaar electronically without the knowledge of any person whose interest may be compromised in the process.

q) BECAUSE these sweeping linkages of the Aadhaar are being undertaken even when the Parliamentary Standing

Even the Planning Commission implementing the current scheme has no mandate for such projects. The Executive orders linking the Aadhaar to any right, entitlement or service is bad in law under the Constitution of India as it violates fundamental rights including the inviolable right to life.

- r) The petitioner has not filed any other petition seeking same reliefs in this Hon'ble Court or any other High Court.
- s) The petitioner has no other alternate equally efficacious remedy than to approach this Hon'ble Court.

PRAYERS

In light of the facts and circumstances of this case, the Petitioner prays as under:

- A) Issue a writ of Mandamus or any other writ, direction in the nature of certiorari or any other appropriate writ, order or directing all the Respondents declaring that the UID will not be needed for delivery of rights, entitlements, services, money or property whatsoever.
- B) Issue an order to all the Respondents to prevent the use of the UID or UID framework, machinery or data for any transactions that deliver rights, entitlements, services, money or property.

- C) Issue an order to Respondent No.4 to freeze all bank accounts opened with the UID.
- D) Issue an order restraining the Respondents from any further waste of public funds on the UID.
- E) Issue an order to Respondent No.2 to cause all electoral rolls prepared with the UID as a proof of identity or address to be revised intensively as required under the Registration of Electors Rules 1960 (25) (2) to be completed before March 2014.
- F) Issue an order to Respondent No.2 and 3 to cause the compilation of the National Population Register in strict compliance of the G.S.R.937 (E) dated 10th December, 2003 and without any direct or indirect linkage or use of the UID or its machinery.
- G) Issue an order to Respondent no.1,3 and 4 to cause all money transfers from accounts opened with the UID to be reversed and subsidies, scholarships and other benefits to be administered as before UID or DBT.
- H) Issue an order to all the Respondents to cause the complete and irretrievable destruction of all copies of all resident data collected and stored by the UIDAI and all its partners and contractors.
- I) Issue an order to the Respondent No.1 to quash the

- J) Issue an order to all the Respondents instituting a time-bound judicial probe for appropriate actions, under the supervision of the court, by a retired CAG and Supreme Court Judge supported by the CBI to investigate the irregularities and illegalities committed under this scheme and such criminal or anti-national acts that may have happened in its implementation.
- K) Issue any other order/direction that this Hon'ble Court may deem fit.

AND FOR THIS ACT OF KINDNESS, THE PETITIONERS AS IN DUTY BOUND SHALL EVER BE GRATEFUL.

Filed By

(Jyoti Mendiratta)

Advocate for Petitioner

Drawn By: Varnika Singh

Drawn on: 18.10.13

Place: DELHI.

Filed on: 19.10.13.